

# SCOPE OF WORK FOR PERSUAP

**For Technical Support of an Initial Environmental Examination (IEE), in Support of  
USAID activities on the \_\_\_\_\_ project/program**

## **Purpose**

This Scope of Work (SOW) describes the services requested for one Pesticide Management Specialist (PMS) who will perform services for the USAID Mission to the country of \_\_\_\_\_ on the following project: \_\_\_\_\_.

The services described herein will enable the above-mentioned project to respond to and comply with the requirements of USAID Regulation 22CFR 216.3(b), USAID's pesticide procedures. These services will make it possible for the project to comprehensively contribute to environmental and human health safety on this project, while achieving project goals.

The PMS will be responsible for conducting an IEE, with an attached *Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP)*. The PERSUAP provides the technical data and analyses that supports the decision(s) in the IEE and does so by examining the pesticide system from import/distribution to disposal using a systems analysis approach. This pesticide system analysis provides the backdrop for accurately addressing the 12 parts of Regulation 216's Pesticide Procedures.

The IEE/PERSUAP will:

- a. Ensure compliance with the Agency's pesticide procedures;
- b. Ensure compliance with the Government of \_\_\_\_\_ pesticide importation, testing, storage, use, disposal and registration regulations, laws, policies and procedures;
- c. Identify and recommend appropriate mitigative actions for incorporation into the projects' activities;
- d. Identify and recommend alternative actions and/or pesticides, as appropriate;
- e. Facilitate use of Integrated Pest Management (IPM) with a view of avoiding or reducing unnecessary pesticide risk; and
- f. Identify and address key pesticide use issues, particularly those that impact on pesticide utilization by small-scale producers, laborers, and \_\_\_\_\_.

The SOW requires that the IEE and PERSUAP produce:

- Documentation on the specific uses of pesticides that will comply with 22 CFR 216.3(b)(1)(i)(a through l) for each activity concerned with procurement or use of

pesticides, including promoting the adoption of particular pesticides and pesticide use technologies supported by USAID;

- Mechanisms for capacity building of the various partners. This should specifically include design of the Safe Use Action Plan part of the PERSUAP, including mitigation and training to ensure that procedures required under 22 CFR 216.3 (b)(1) are disseminated and understood by all partners.

## **Project/Program Background, Goals and Activities**

Mission/Program Fill in \_\_\_\_\_

## **PERSUAP Background, Scope and Application**

### **Background**

#### Overview of review requirements

All USAID activities are subject to evaluation via, at minimum, an Initial Environmental Examination (IEE) and at maximum an Environmental Assessment (EA). And because of high risk concerns presented by pesticides, the USAID environmental regulations require that at least the 12 factors outlined in the Pesticide Procedures described in 22 CFR 216.3 (b)(1)(i) (a through l) be addressed in the IEE for any program that includes assistance for the procurement or use of pesticides. For several years, the Agency has asked that these factors be examined using a systems approach in a particular type of document, termed a “Pesticide Evaluation Report and Safer Use Action Plan” (PERSUAP), which is submitted as an attachment to the IEE.

The PERSUAP focuses on the particular circumstances of the program in question, the risk management choices available, and how a risk management action plan would be implemented in the field. Further details about what to include in a PERSUAP are given below.

Why is a local-level assessment such as a PERSUAP needed for USAID pesticide programs? To help in understanding the utility, consider the U.S. system for promoting pesticide safety. When the USEPA registers pesticides for use in the United States, it specifies the manner in which the product can be “safely” used (i.e., with an acceptably small risk), including safety equipment needed when applying the pesticide, how to apply it, the allowed uses, etc. But the context in which EPA makes these registration decisions is important to note. An extensive system of capabilities and resources exist in this country that help give EPA confidence these specifications will be followed and the product will be used appropriately. These include a 97% literacy rate meaning most of the population can read pesticide labels; close control by EPA over the content of the label; training requirements and programs for those pesticide products that require applicator certification; worker protection requirements; occupational safety regulations; and

relatively effective federal, state and local enforcement mechanisms. In allowing the use of certain pesticides in its overseas programs, USAID cannot rely on the same societal capabilities and resources that the USEPA does to assure appropriate use of the product. The preparation of a PERSUAP gives a program manager the opportunity to consider practical actions by which to reduce the risks of using pesticide products in a program, taking into consideration the context in which the products will be used, the particular elements of the program, and the different capacities of the partners involved.

### Who prepares a PERSUAP?

Program managers are generally responsible for assuring that environmental review requirements for their programs are met, including the drafting of IEE/PERSUAPs. As for all environmental reviews, guidance and assistance for PERSUAPs is available from the appropriate Mission Environmental Officer (MEO), Regional Environmental Officer (REO), and the Bureau Environmental Officer (BEO).

To source technical expertise to perform the PERSUAP, the following is useful: The most common pesticides used are insecticides, fungicides and herbicides, and the use of IPM is USAID policy; therefore, degrees or significant coursework and expertise in entomology, plant pathology, weed science, IPM, pesticide toxicology and soil science are very useful. Several years of experience understanding and working with Regulation 216, Agency BEOs, training on Regulation 216, and actual experience performing PERSUAPs should also be required.

### Components of an activity-level PERSUAP

A PERSUAP basically consists of two parts, a “PER” and a “SUAP.” The Pesticide Evaluation Report (PER) section performs the systems analysis of the country’s pesticide system from import to ultimate disposal. It addresses the 12 informational elements required in the Agency’s Pesticide Procedures. The Safer Use Action Plan (SUAP) puts the conclusions and recommendations reached in the PER into a plan of action, including assignment of responsibility to appropriate parties connected with the pesticide program.

### **Scope**

Pesticides, if not used properly, can also kill and injure humans, as well as environmental resources. Pesticides are synthetic or natural product (plant, microbe)-derived chemical products intended to kill, control, and repel insects, plant diseases, weeds, and other pest organisms. Plant-derived insecticides and those restricted, cancelled, or suspended by the USEPA are listed in two chapters, *Integrated Pest Management* (Schroeder, 2004, Tellus Institute) and *Safer Pesticide Use* (Schroeder, 2004, Tellus Institute) in Africa Bureau’s “*Environmental Guidelines for Small-Scale Activities*”. The analysis will cover those pesticides proposed for use by \_\_\_\_\_ project that are:

- Registered by USEPA for the same or similar uses without restrictions;
- Also registered by the Government of \_\_\_\_\_; and
- Available in the country of \_\_\_\_\_.

The study will cover activities under the project, which may involve assistance for the procurement or use of pesticides. Under this SOW, assistance for the procurement or use of pesticides is defined broadly and includes recommending the conduct of training programs in pesticide handling/use.

### **Application of study**

The IEE/PERSUAP to be written shall include appendices evaluating the economic, social, and environmental risks and benefits of the planned pesticide use to determine whether the use may result in significant environmental impact. If the PERSUAP determines that a specific pesticide use will *significantly* affect the environment or human health, an Environmental Assessment (EA) will normally be conducted.

The SUAP will also:

1. Assure accessibility of protective clothing and equipment needed, and training on safe use;
2. Emphasize operational monitoring & evaluation;
3. Work with the implementer to define Roles of key staff and interested actors such as Public Sector, Commercial Private Sector, and Non-profit private sector PVOs, NGOs;
4. Integrate Mitigation Measures
5. Disposal provisions for used pesticide containers

### Roles

USAID/\_\_\_\_\_:

USAID/\_\_\_\_\_ through its CTO and the MEO will take an active role in working with the PMS in the conduct of the study. The MEO will provide specific technical guidance and direction, review progress and other draft materials produced by the PMS and perform liaison functions, as needed, with the ANE/BEO and USAID/\_\_\_\_\_. The Regional Environmental Officer (REO), as appropriate, may also collaborate with the PMS at the initiation of the study to provide information and perspective and links to USEPA, as might be necessary.

\_\_\_\_\_ Project/Program:

The \_\_\_\_\_ project will assign a contact person or persons to work with the PMS. The contact person will assist the PMS in developing the study by providing information about uses and conditions of use for all pesticides, types of activity implementation, roles and responsibilities of implementing partners, farmers, laborers, extension officers, \_\_\_\_\_ with the purpose of ensuring that all relevant pesticides are covered and to help the PMS design training for those at risk in the field. Each project, through the contact person will be responsible for reviewing and providing comments on the study.

PMS:

As a consultant, the PMS will be responsible for: 1) acquiring and synthesizing information on the country of \_\_\_\_\_'s ability to regulate or control the acquisition, distribution, usage, storage and disposal of pesticides; 2) USEPA and local restrictions on use of pesticides; 3) examining, by site visits, the conditions under which various pesticides will be used (climate, flora, fauna, geography, hydrology, soils, near water bodies etc); and 4) acquiring from the project information on the extent to which the pesticide use is and could be part of an integrated pest management program.

#### PMS Tasks and Responsibilities

- Review list of potential pesticides to be procured/used under the programs, and review USPA status of the pesticides.
- Contact Mission MEO, appropriate Ministries and ANE to review compliance requirements and pest management options and develop an agreed upon definition of “assistance for procurement or use of pesticides”.
- Assess the overall capabilities and limitations of the \_\_\_\_\_ project’s pesticide management relative to the more common pesticide use problems affecting the targeted users/implementers.
- Outline “Off the Shelf” IPM and GAP (Good Agriculture Practices) measures that could be tried and used by the project’s clients for each production or commodity constraint.
- Compile market-driven GAP/Organic/Fair Trade Standards and Certification schemes operating in \_\_\_\_\_ or the region.
- Recommend/outline a training program, including a plan to train participants who will be implementing the recommendations of the study.
- Following a description of the proposed usage and expected benefit of the requested pesticides, address each of the following factors listed under 22 CFR 216.3(b)(1)(i):
  - The USEPA and Local registration status of the requested pesticides
  - Extent to which the proposed pesticide is part of the integrated pest management
  - The proposed method of application, including availability of appropriate application and safety equipment;
  - Any acute or long term toxicological hazards, either human or environmental, associated with the proposed use, and measures available to minimize such hazard;
  - The effectiveness of the pesticide for the proposed use;
  - Compatibility of the proposed pesticide with target and non- target ecosystems;
  - The availability and effectiveness of other pesticides or non chemical control methods;
  - Provisions made for monitoring the use and effectiveness of the pesticide;
  - Country’s ability to regulate or control the distribution, storage, use, and disposal of the pesticide; and
  - Provisions made for training of users and applicators, and outline a training plan for participants and extension officers
- Draft the IEE and PERSUAP; respond to comments from MEO, CTO, REO (if present), BEO, and the project contact persons.

**Deliverables**

Final Report: IEE and PERSUAP.

**Period of performance**

Mission/Program fills in. Generally 20 days, six-day work-week, for most PERSUAPs. Three-five days prep, 12 days in-country, three-five days follow-up.